

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRITISH TELECOMMUNICATIONS PLC,)

Plaintiff,)

v.)

GOOGLE INC.,)

Defendant.)

C. A. No.: 11-1249 (LPS)

JURY TRIAL DEMANDED

PROPOSED ORDER

At Wilmington this 23rd day of January, 2014, having considered Plaintiff

British Telecommunications plc's Motion *in Limine* No. 3 to Preclude Evidence ("Motion *in Limine* No. 3"), related pleadings and arguments,

IT IS HEREBY ORDERED that Plaintiff British Telecommunications plc's ("BT") Motion *in Limine* No. 3 is GRANTED, and

Defendant Google Inc. ("Google") shall be PRECLUDED from referencing, in testimony, documents, comments, questions, arguments, or suggestions, the following because its probative value, if any, is substantially outweighed by the danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time or needlessly presenting cumulative evidence:

1. The term "patent troll";
2. BT's licensing activities unrelated to the patents in suit;
3. Other litigation;
4. Any exhibits related to BT's licensing activities unrelated to the patents

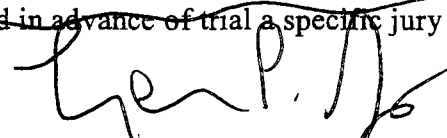
in suit or other litigation, including but not limited to DTX Nos. 0014, 0142-0156;

5. That BT's decisions regarding commercialization of its patents has any bearing on validity, the presumption of validity, or infringement;

6. BT's corporate citizenship in any manner that rests on improperly instilling an "us vs. them" nationalistic mentality;

7. ~~Referencing the absence from trial of any witnesses as to whom Google has not sought and received in advance of trial a specific jury instruction.~~

LPA


United States District Judge